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September 30, 2021

Application GRANTED.

SO ORDERED.
Dated: 09/30/2021

BY ECF
Honorable P. Kevin Castel
United States District Court
United States Courthouse
500 Pearl Street
New York, NY 10007

P. Kevin Castel
United States District Judge

Re: United States v. Grasso, et al.
20 CR 163(PKC)

Dear Judge Castel:

We write to request a further adjournment of pre-trial motions in the above-referenced matter currently scheduled to be filed on October 1, 2021. Since September 9, 2021, the date on which we submitted our initial request for additional time to prepare motions (and promised the court that by October 1, 2021 we would let the court know how much more time we would need to file motions), we have reviewed motions filed by Mr. Poliseno's co-defendants in this matter and have also contacted Mr. Poliseno's former counsel to obtain discovery materials. As the Court is aware, one of the motions submitted by counsel for Louis Grasso is to suppress wiretap evidence. In order to assert standing for such a motion, we must conduct a preliminary review of the discovery material in this matter. Former counsel for Mr. Poliseno initially sent the discovery productions over Google Drive, however the files were too large to download on our end. We have been in contact with former counsel this week, who is having the material copied onto a hard drive (the material is over 1 TB) and sent to our office.

Accordingly, we request a final adjournment of four weeks until November 1, 2021 to allow for our receipt of the drive, review of wiretap materials and preparation of any relevant pre-trial motions. We have spoken with government counsel and they do no object to this request.

Respectfully Submitted,

/s/ Louis M. Freeman
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Louis M. Freeman